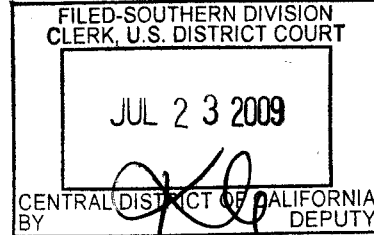


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8 Attorneys for Plaintiff  
9 United States of America

10  
11 UNITED STATES DISTRICT COURT  
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA, ) Case No. SA CR 08-223-AG  
14 )  
Plaintiff, ) GOVERNMENT'S NOTICE OF REQUEST  
15 ) FOR DETENTION  
16 v. )  
17 )  
JAGMOHAN S. DHILLON, )  
18 )  
Defendant. )  
19 )  
20 )

21  
22 Plaintiff, United States of America, by and through its  
23 counsel of record, hereby requests detention of defendant and  
24 gives notice of the following material factors:

25 1. Temporary 10-day Detention Requested (§ 3142(d))  
26 on the following grounds:

27 a. offense committed while defendant was on  
28 release pending (felony trial), (sentencing)  
(appeal) or on (probation) (parole);

1           \_\_\_ b. alien not lawfully admitted for permanent  
2                       residence;

3           \_\_\_ c. flight risk;

4           \_\_\_ d. danger to community.

5           X 2.   Pretrial Detention Requested (§ 3142(e)) because  
6                       no condition or combination of conditions will  
7                       reasonably assure against:

8           X a.   danger to any other person or the community;

9           X b.   flight.

10          \_\_\_ 3.   Detention Requested Pending Supervised  
11                       Release/Probation Revocation Hearing (Rules 32.1,  
12                       46, § 3143) because defendant cannot establish a  
13                       condition or combination of conditions that will  
14                       reasonably assure against:

15          \_\_\_ a.   Danger to any other person or the community;

16          \_\_\_ b.   Flight.

17          X 4.   Presumptions Applicable to Pretrial Detention (18  
18                       U.S.C. § 3142(e)):

19          X a.   Title 21 offense with 10-year or greater  
20                       maximum penalty (presumption of danger to  
21                       community and flight risk);

22          \_\_\_ b.   firearm used or carried during offense (18  
23                       U.S.C. § 924(c)) (presumption of danger to  
24                       community and flight risk);

25          \_\_\_ c.   offense under Maritime Drug Law Enforcement  
26                       Act (46 U.S.C. App. 1901 et seq.) (presumption  
27                       of danger to community and flight risk);

1           — d. defendant currently charged with (I) crime of  
 2           violence, (II) offense with maximum sentence  
 3           of life imprisonment or death, (III) Title 21  
 4           offense with ten year or greater maximum  
 5           sentence, or (IV) state or local offense that  
 6           would qualify under I, II, or III if federal  
 7           jurisdiction were present, and defendant was  
 8           previously convicted of a crime listed in I,  
 9           II, or III committed while on release pending  
 10          trial, and the current offense was committed  
 11          within five years of conviction or release  
 12          from prison on the above-described previous  
 13          conviction (presumption of danger to  
 14          community).

15          — e. Title 18, United States Code offense involving  
 16          a minor victim under section 1201, 1591, 2241,  
 17          2242, 2244(a)(1), 2245, 2251, 2251A,  
 18          2252(a)(1), 2252(a)(2), 2252(a)(3),  
 19          2252A(a)(1), 2252A(a)(2), 2252A(a)(3),  
 20          2252A(a)(4), 2260, 2421, 2422, 2423, or 2425.

21          X 5.   Government is Entitled to Detention Hearing  
 22               Under § 3142(f) Based on the Following:

23          — a. crime of violence (defined in 18 U.S.C. §  
 24               3156);

25          — b. maximum sentence is life imprisonment or  
 26               death;

27          X c. Title 21 offense with maximum sentence of ten  
 28

years or more;

\_\_\_\_ d. instant offense is felony and defendant has  
two or more convictions for a crime set forth  
in a-c above or for an offense under state or  
local law that would qualify under a, b, or c  
if federal jurisdiction were present;

\_\_\_\_ e. serious risk of flight;

\_\_\_\_ f. serious risk of (obstructing justice or  
attempting to obstruct justice) (threatening,  
injuring, or intimidating witness or juror, or  
attempting to do so).

\_\_\_\_ 6. Government requests continuance of \_\_\_\_ days for  
detention hearing based upon the following  
reason: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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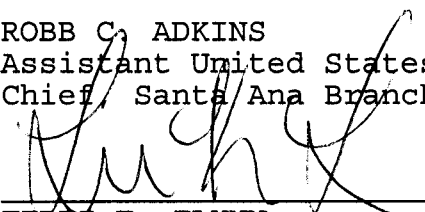
1        7.        Good cause for continuance in excess of three  
2                    days exists in that:

3                    \_\_\_\_\_  
4                    \_\_\_\_\_  
5                    \_\_\_\_\_  
6                    \_\_\_\_\_

7 DATED: July 23, 2009.    Respectfully submitted,

8                    THOMAS P. O'BRIEN  
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13                     
14                   \_\_\_\_\_  
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18                   United States of America  
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